

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

SUMNER SQUARE  
1615 M STREET, N.W.  
SUITE 400  
WASHINGTON, D.C. 20036-3215

(202) 326-7900

FACSIMILE:  
(202) 326-7999

July 13, 2021

*Via ECF*

The Honorable Sarah Netburn  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

I write on behalf of Defendant Kingdom of Saudi Arabia (“Saudi Arabia”) concerning a sealed filing made by Saudi Arabia today. Today’s filing is an opposition to the June 29, 2021 objections filed by the Plaintiffs’ Executive Committees (“Plaintiffs”) pursuant to Federal Rule of Civil Procedure 72(a). *See* ECF No. 6891.

Saudi Arabia’s opposition discusses, and attaches as Exhibits A and B, excerpts of deposition transcripts that, under the Court’s deposition protocol, are treated as confidential in their entirety for 90 days, pending confidentiality designations by the parties or by the Federal Bureau of Investigation. Because that confidentiality-designation process is ongoing, Saudi Arabia respectfully requests that the Court accept today’s filing under seal pursuant to the MDL Protective Order, ECF No. 1900, and the FBI Protective Order, ECF No. 4255.

Saudi Arabia’s opposition also discusses, and attaches as Exhibit C, documents bearing the Bates numbers KSA 1256 and 1257, which are sealed under this Court’s July 22, 2019 Order. *See* ECF No. 4696, at 9, 10-11.

Saudi Arabia is making today’s filing under seal using the Court’s sealed ECF procedures. Copies of Saudi Arabia’s opposition and exhibits (clean and with highlighted proposed redactions) are being sent today by email to Your Honor’s chambers, and to counsel for Plaintiffs, the United States, and Dallah Avco. No courtesy copies of this letter or of today’s sealed filing are being sent to the chambers of Judge Daniels, as instructed by the temporary revisions to his Individual Practices in light of the ongoing public health crisis.

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Respectfully submitted,

*/s/ Michael K. Kellogg*

Michael K. Kellogg  
*Counsel for the Kingdom of Saudi Arabia*

cc: All MDL Counsel of Record (via ECF)